

# COVINGTON

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October 29, 2021

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re:     *United States v. Mark S. Scott, S10 17 Cr. 630(ER)***

Dear Judge Ramos:

We write on behalf of our client, Mark Scott, with respect to the scheduling of the defendant's Reply Brief in connection with his Supplemental Rule 33 Motion, which seeks a new trial based on perjury by cooperating witness Konstantin Ignatov ("Konstantin"), currently due October 29, 2021.

For several reasons, we respectfully request an extension of that deadline. Last Thursday, the Government provided 10.1 GB of data from the contraband cellphone seized in February 2020 that Konstantin used while incarcerated, much of which is communications in a foreign language. In addition, since the last extension request, counsel for Mr. Scott has obtained and shared with the Government additional information supporting that Irina Dilkinska was in India at the time of a supposed meeting between Mr. Scott and Dilkinska at OneCoin's Sofia, Bulgaria offices on July 20, 2016, contrary to the testimony of Konstantin. We are awaiting Government responses on several questions relating to these issues, which are better resolved before further briefing.

Based on our communications with the Government to date, we presently expect to be able to file the reply brief by November 8, 2021. The Government consents to this request.

Respectfully submitted,

/s/ Arlo Devlin-Brown  
Arlo Devlin-Brown